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February 9, 2024

VIA ECF

Honorable Jessica S. Allen
United States Magistrate Judge
District of New Jersey
Martin Luther King, Jr. Federal Courthouse
50 Walnut Street
Newark, NJ 07102

Re: United States v. Daniel Dadoun, Mag. No. 23-8137 (JSA)

Dear Judge Allen:

We represent Mr. Daniel Dadoun in the above-captioned matter. Mr. Dadoun has been detained at the Essex County Correctional Facility (“ECCF”) since November 13, 2023. We write to respectfully request the Court issue an Order instructing ECCF to grant Mr. Dadoun library privileges to the greatest extent possible. ECCF has granted Mr. Dadoun library privileges on Saturdays, but Mr. Dadoun is an observant Jew, and this observance includes not working (or using computers) on the Jewish Sabbath. The Jewish Sabbath starts at sundown Friday and lasts until sundown Saturday. Therefore, his religious observance does not allow him to perform the tasks in the library that he needs to accomplish.

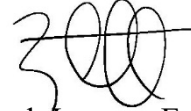
Counsel has repeatedly requested that ECCF provide Mr. Dadoun expanded access to the library four days a week, aside from Saturdays. Those requests resulted in one change to the library hours, to add access on Wednesdays, but officials at the ECCF have advised that if they have an Order from this Court, then Mr. Dadoun will have additional access, in line with other inmates who have document-intensive cases who are awaiting trial at ECCF. Counsel has also

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raised this with the AUSA assigned to the case and advised of the issue, though counsel understands that the AUSA does not have any authority over ECCF.

Because the administrators at ECCF are specifically seeking an Order from this Court, we respectfully request that the Court intervene. Specifically, we ask that this Court sign the enclosed order directing ECCF to afford Mr. Dadoun the maximum amount of library access, excluding Saturdays. The government has no objection to this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Zach Intrater', with a stylized, cursive flourish.

Zach Intrater, Esq.

cc: AUSA Katherine Romano (via ECF)